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Our Ref: GBC/2023/093692
Date: 24 January 2023

Application No: 20221328

Location: Bowling Green , Church Walk, Gravesend, Kent DA12 2QU

Proposal: Demolition of existing bowls pavilion and erection of a 4- storey building to provide a 62-unit Use Class C2 retirement living complex, with a new access from Ellerslie, a new emergency access off Ellerslie, parking, landscaping and associated works.

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment prepared by Amazi Consulting Ltd (1 November 2022) and the Drainage Strategy report prepared by Infrastructure Design Ltd. (20 October 2022) and have the following comments:

1. We understand that surface water from the site will be discharged at 1.4 l/s to the Southern Water combined sewer to the south of the site. Cellular crate storage and permeable paving will provide attenuation for all storm events up to and including the 100(+CC) year event. While we have no objection in principal with this proposal we would expect for further investigations into the feasibility of infiltration to be undertaken. This can be provided at detailed design stage.
2. No hydraulic modelling results appear to have been provided within Appendix E. These should include the critical results summary to enable confirmation that no surcharging is occurring within 2 year event or flooding within the 30 year event. We would also expect to see the 'upper end' climate change allowance for the 30 (3.3%) as well as the 100 (1%) year storm scenarios.
3. A large surface water flow path has also been identified running through the site, ranging from low to high risk. We understand this will be managed via a swale running from the south of the site along the eastern border to direct flows around the site. Ground levels will also be kept low to the west of the building in order to direct flows away from buildings.

Whilst we have no objection to these methods we would require further details on this swale network, as well as modelling to show the surface water flow path will cause no significant flooding within the area post-development for all storm events

up to and including the 100(+CC) year storm event. This should include the depths and velocities of water running through the site post-development.

We would therefore recommend a holding objection for this application until information pertaining to point 2 above is provided. All other required information can be provided at detailed design stage.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

Gideon Miller

Graduate Flood Risk Officer
Flood and Water Management